

Stakeholder Comments Template

Reliability Services Initiative - Phase 2

Revised Draft Final Proposal

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the revised draft final proposal for the Reliability Services Initiative - Phase 2 that was posted on July 7, 2016. The revised draft final proposal and other information related to this initiative may be found at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **July 21, 2016**.

If you are interested in providing written comments, please organize your comments into one or more of the categories listed below as well as state if you support, oppose, or have no comment on the proposal.

1. Clarify Local Regulatory Authority (LRA) interaction and process alignment. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

CDWR does not support the Regional RA process on this issue, but has no objection to deferring the initially proposed LRA template here.

2. Substitution for flexible capacity resources on planned outage. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

ISO’s intent is to ensure that any substitute capacity is able to provide flexible capacity similar to that of the resource going on a planned outage. The mechanism should allow a higher quality resource (category 1) to substitute for lower quality (Category 2 and 3).

3. Separate local and system RA for purpose of forced outage substitution. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

CDWR supports the proposal to allow resources in a local area procured for system RA that go on forced outage to be substituted with another system resource to avoid RAIM charges. CDWR also supports that a resource can be shown for both system (including flexible) and local RA.

However, CAISO should clarify that a resource can be shown simultaneously for system, flexible, and local RA, if eligible. In such case, will the substitution rules apply differently (according to the type of RA capacity) for each category of RA capacity shown?

4. Process to update EFC list during the year. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

CDWR suggests that EFC update be linked to NQC update request by an SC. Since ISO calculates the EFC, ISO should update increased EFC also and notify the SC that EFC has been updated with the NQC update request. If the NQC increases in the update, EFC will automatically be increased and increased EFC will cause no harm to the SC requesting NQC increase update.

5. Address the RAAIM exemption currently in place for combined flexible capacity resources. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

No comment.

6. Streamlining monthly RA showings. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

CDWR supports the change in the Revised Draft Final Proposal to no longer propose automatically rolling an LSE's RA showings from the annual into the monthly showings.

7. RA showing requirements for small LSEs. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

No comment.

8. Other

No comment.